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Hearing Date: February 5, 2019 at 2:00 p.m. (EST)  
Objection Deadline: January 29, 2019 at 4:00 p.m. (EST)

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:  
MOTORS LIQUIDATION COMPANY, et al.,  
f/k/a General Motors Corp., et al.,

Debtors.

Chapter 11  
Case No.: 09-50026 (MG)

(Jointly Administered)

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**[PROPOSED] ORDER GRANTING AMERICAN AXLE’S MOTION TO  
INCLUDE THE TONAWANDA FORGE SITE IN THE RACER TRUST OR, IN  
THE ALTERNATIVE, FOR AUTHORITY TO FILE A LATE CLAIM AGAINST  
THE DEBTOR TO PARTICIPATE IN DISTRIBUTIONS  
FROM THE GUC TRUST**

Upon the Motion, dated December 21, 2018 (“the Motion”), of American Axle Manufacturing Inc. (“**American Axle**”), for entry of an order ruling that American Axle’s claim against Old General Motors Corporation (“**Old GM**”) is properly resolved by the inclusion of the property located at 2390 and 2392 Kenmore Avenue, Tonawanda, New York (“the **Tonawanda Forge Site**”) in the Revitalizing Auto Communities Environmental Response Trust (“**RACER Trust**”), or in the alternative, for entry of an order allowing American Axle to prosecute a late proof of claim against Old GM’s General Unsecured Creditor’s Trust (“**GUC Trust**”); it is hereby

ORDERED that the Tonawanda Forge Site shall be included in the properties administered by the RACER Trust and shall be subject to the terms and conditions of the Settlement Agreement dated March 31, 2011 whereby the RACER Trust was created; and it is further

ORDERED that American Axle is authorized to file a late proof of claim against Old GM related to contamination caused by Old GM at the Tonawanda Forge Site to enable American Axle to participate in distributions from the GUC Trust. All parties' rights are reserved to object to American Axle's claim for any reason except the timeliness of its filing.

Dated: February \_\_\_, 2019

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Honorable Martin Glenn, U.S.B.J.